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7	T.11		CTDIOT COUDT		
8		NITED STATES DI			
9	FOR THE	NORTHERN DIST	RICT OF CALIFO	ORNIA	
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11	IN RE: SOCIAL MEDIA ADO ADDICTION/PERSONAL IN		MDL No. 3047		
12	PRODUCTS LIABILITY LIT	IGATION		-md-03047-YGR-PHK	
13 14	THIS DOCUMENT RELATE	S TO:	REGARDING I	ALING STIPULATION DKT. NOS. 2212 AND	
15	ALL ACTIONS	5 10.	2213	nna Canzalaz Dagara	
16			Magistrate Judge	onne Gonzalez Rogers e: Hon. Peter H. Kang	
17					
18					
19	Pursuant to Civil Local	Rules 7-11 and 79-5	and the Court's May	22, 2023 Protective Order	
20			-		
21	(Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively,				
22	"YouTube") and Plaintiffs (col				
23	connection with the Parties' S	tipulation re YouTub	ne Noncustodial Sou	arces (ECF No. 2212) and	
24	Attachments 1-11 filed under seal (ECF No. 2213).				
25	At this time, Plaintiffs	do not oppose the sea	lling request and res	erve all rights to challenge	
26	designations and sealing in the	future. Accordingly,	, the Parties stipulate	e to the following chart.	
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	OMNIBUS SEALING STIPULATION	ON		CASE No.: 4:22-03047-YGR	

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I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS

3 4	Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
5 6 7 8 9 10 11 12	2213-1	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
14 15 16 17 18 19 20 21	2213-2	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit A-1	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause competitive harm to YouTube. See Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
22 23 24 25 26 27 28	2213-3	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit B	Maintain under seal	Good cause exists to seal sensitive and confidential information about YouTube's platform, data repository, and tool design, as well as user reports. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, including trade secrets and competitive information, and thereby cause	A party has not previously sought to seal the same information.

OMNIBUS SEALING STIPULATION -1- CASE No.: 4:22-03047-YGR

1 2	Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
3 4				competitive harm to YouTube. See Declaration of Christopher Chiou ("Chiou Decl.") at 2.	
5				Good cause exists to seal sensitive and confidential	
6		Evidentiary		information about YouTube's platform, data repository, and	
7		Stipulation and Proposed Order		tool design, as well as user reports. Disclosure of the	A party has
8	2212.4	Regarding	Maintain	information would provide	not previously
9	2213-4	YouTube's Production from	under seal	competitors with insights into YouTube's business they would	sought to seal the same
10		Non-Custodial Sources, Exhibit		not otherwise have, including trade secrets and competitive	information.
11		B-1		information, and thereby cause competitive harm to YouTube.	
12				See Declaration of Christopher	
13				Chiou ("Chiou Decl.") at 2. Good cause exists to seal	
14				sensitive and confidential information about YouTube's	
15		Evidentiary		platform, data repository, and	
16		Stipulation and Proposed Order		tool design, as well as user reports. Disclosure of the	A party has
17	2213-5	Regarding YouTube's	Maintain	information would provide competitors with insights into	not previously sought to seal
18		Production from	under seal	YouTube's business they would	the same
19		Non-Custodial Sources, Exhibit		not otherwise have, including trade secrets and competitive	information.
20		С		information, and thereby cause competitive harm to YouTube.	
21				See Declaration of Christopher Chiou ("Chiou Decl.") at 2.	
22				Good cause exists to seal	
23		Evidentiary		sensitive and confidential information about YouTube's	
24		Stipulation and Proposed Order		platform, data repository, and tool design, as well as user	A party has
25	2213-6	Regarding YouTube's	Maintain	reports. Disclosure of the	not previously sought to seal
26		Production from	under seal	information would provide competitors with insights into	the same
		Non-Custodial Sources, Exhibit		YouTube's business they would not otherwise have, including	information.
		D		trade secrets and competitive	
27 28		D		_	

Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
			competitive harm to YouTube. See Declaration of Christopher Chiou ("Chiou Decl.") at 3.	
			Good cause exists to seal sensitive and confidential	
	Evidentiary		platform, data repository, and	
	Stipulation and Proposed Order			A party has
2213-7	Regarding YouTube's	Maintain	information would provide	not previously sought to seal
2213 /	Production from	under seal	YouTube's business they would	the same
	Sources, Exhibit		trade secrets and competitive	information.
	D-1		<u>-</u>	
			See Declaration of Christopher Chiou ("Chiou Decl.") at 3.	
			Good cause exists to seal	
			information about YouTube's	
	Stipulation and		tool design, as well as user	
	_	36.4	reports. Disclosure of the information would provide	A party has not previously
2213-8	YouTube's	under seal	competitors with insights into	sought to seal the same
	Non-Custodial		not otherwise have, including	information.
	Sources, Exhibit E		information, and thereby cause	
			See Declaration of Christopher	
			Chiou ("Chiou Decl.") at 3. Good cause exists to seal	
	Evidentiary		sensitive and confidential	
	Stipulation and Proposed Order		platform, data repository, and	A party has
2213-9	Regarding	Maintain	reports. Disclosure of the	not previously sought to seal
2213-7	Production from	under seal	information would provide competitors with insights into	the same
	Sources, Exhibit		YouTube's business they would	information.
	E-1		trade secrets and competitive	
	No. 2213-7	Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit D-1 Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit	No. Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit D-1 Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit E Evidentiary Stipulation and Proposed Order Regarding YouTube's Production from Non-Custodial Sources, Exhibit Maintain under seal	No. Description Action Basis for Sealing Competitive harm to YouTube. See Declaration of Christopher Chiou ("Chiou Decl.") at 3.

1 2	Dkt. No.	Description	Requested Action	Basis for Sealing	Whether Previously Sealed
				competitive harm to YouTube.	Scaled
3				See Declaration of Christopher	
4				Chiou ("Chiou Decl.") at 3.	
7				Good cause exists to seal	
5				sensitive and confidential	
_				information about YouTube's	
6		Evidentiary		platform, data repository, and	
7		Stipulation and		tool design, as well as user	
, l		Proposed Order		reports. Disclosure of the	A party has
8	2213-	Regarding	Maintain	information would provide	not previously
	10	YouTube's	under seal	competitors with insights into	sought to seal
9		Production from	under sear	YouTube's business they would	the same
10		Non-Custodial		not otherwise have, including	information.
		Sources, Exhibit		trade secrets and competitive	
11		F		information, and thereby cause	
10				competitive harm to YouTube. See Declaration of Christopher	
12				Chiou ("Chiou Decl.") at 3.	
13				Good cause exists to seal	
				sensitive and confidential	
14				information about YouTube's	
15		Evidentiary		platform, data repository, and	
15		Stipulation and		tool design, as well as user	
16		Proposed Order		reports. Disclosure of the	A party has
	2213-	Regarding	Maintain	information would provide	not previously
17	11	YouTube's	under seal	competitors with insights into	sought to seal
18	11	Production from	under sear	YouTube's business they would	the same
10		Non-Custodial		not otherwise have, including	information.
19		Sources,		trade secrets and competitive	
20		Exhibits F-1		information, and thereby cause	
20				competitive harm to YouTube.	
21				See Declaration of Christopher Chiou ("Chiou Decl.") at 4.	
				Cinou (Cinou Deci.) at 4.	<u> </u>
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IT IS SO STIPULATED AND AGREED.

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Respectfully submitted,

DATED: September 8, 2025 WILSON SONSINI GOODRICH & ROSATI

CASE No.: 4:22-03047-YGR

Professional Corporation

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9	<u>ATTESTATION</u>	
10	I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the	
11	concurrence to the filing of this document has been obtained from each signatory hereto.	
12		
13	Dated: September 8, 2025	
14	By: <u>/s/ Christopher Chiou</u> Christopher Chiou	
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